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15 UNITED STATES DISTRICT COURT
16
17 NORTHERN DISTRICT OF CALIFORNIA
18
19 SAN FRANCISCO DIVISION

20 UNITED STATES OF AMERICA,) CASE NO. 21-CR-105 VC
21 Plaintiff,) [Filed March 11, 2021]
22 v.)
23 ROBERT JESUS BLANCAS,) JOINT MOTION TO RELATE CASES AND
24 Defendant.) SEVER

25
26 UNITED STATES OF AMERICA,) CASE NO. 21-CR-121 JD-2
27 Plaintiff,) [Filed March 23, 2021]
28 v.)
29 (2) ROBERT JESUS BLANCAS,) JOINT MOTION TO RELATE CASES AND
30 Defendant.) SEVER

31
32 The United States and Robert BLANCAS hereby (i) jointly move the Court pursuant to Local
33 Criminal Rule 8-1 to relate the two cases in which BLANCAS is charged, 21-CR-105 VC and 21-CR-
34 121 JD-2, for purposes of entering a guilty plea and sentencing; and (ii) jointly move the Court, pursuant
35 to the attached Joint Motion to Relate Cases and Sever, to sever the two cases.
36
37 JOINT MOTION TO RELATE CASES AND SEVER
38 U.S. v. ROBERT JESUS BLANCAS

1 to Federal Rule of Criminal Procedure 14, to sever BLANCAS from the other defendants in 21-CR-121
2 JD.

3 In Case No. 21-CR-105 VC, BLANCAS is charged with enticement of a minor to engage in
4 sexual activity (production of child pornography), in violation of 18 U.S.C. § 2422(b). In Case No. 21-
5 CR-121 JD, BLANCAS and three others are charged with conspiracy to obstruct justice by destroying
6 records, in violation of 18 U.S.C. § 1512(k), and additional counts of destroying records in official
7 proceedings and obstructing official proceedings, in violation of 18 U.S.C. §§ 1512(c)(1) and (c)(2).

8 The government previously filed a Notice of Related Case in a Criminal Action on April 9, 2021.
9 The Court declined to relate the cases at that point, but then indicated it would reconsider the issue later
10 if certain events arose in the litigation of both cases, including a global resolution as to BLANCAS.

11 The government and BLANCAS have reached a proposed resolution in both cases. The
12 resolution contemplates a single plea agreement addressing both matters. Accordingly, in view of the
13 parties' apparent resolution and to avoid prejudice to the defendant that might otherwise arise from
14 conviction and sentencing proceedings in two separate matters, the parties seek to have the change of
15 plea and sentencing hearings for BLANCAS handled by one Court. This will also be more efficient for
16 the Court, as it will avoid duplicate investigations of BLANCAS's background for purposes of the Pre-
17 Sentence Investigation Report. Accordingly, the government and BLANCAS jointly request that the
18 Court relate Case No. 21-CR-121 JD (as to BLANCAS) to Case No. 21-CR-105 VC, and sever
19 BLANCAS from the remaining defendants in Case No. 21-CR-121 JD. As stated in the initial notice,
20 relation is appropriate because both cases involve the same defendant and some of the same events and
21 occurrences. Assignment of both cases to a single judge will conserve judicial resources and promote
22 the efficient resolution of both matters.

23 DATED: July 16, 2021

/s/
ERIC CHENG
FRANK RIEBLI
Assistant United States Attorney

26 DATED: July 16, 2021

/s/ with permission
ALAN DRESSLER
Counsel for Defendant Robert Jesus BLANCAS

1 [PROPOSED] RELATED CASE ORDER

2 A joint motion to relate cases and sever has been filed in the following cases:

3 21-CR-105 VC U.S. v. Robert Jesus BLANCAS

4 21-CR-121 JD-2 U.S. v. Robert Jesus BLANCAS

5 On the basis of the material submitted to the Court, as the Judge assigned to the earliest-filed
6 case, I find that the cases ARE RELATED, as defined by Crim. L.R. 8-1(b), as to defendant Robert
7 BLANCAS. Pursuant to Crim. L.R. 8-1(e), the Clerk of Court is ordered to reassign the later-filed
8 action, as to BLANCAS, Case No. 21-CR-121 JD-2, to the undersigned. Counsel are instructed that all
9 future filings are to bear the initials VC immediately after the case number. All matters presently
10 scheduled for hearing in the reassigned case(s) are vacated and must be renoticed for hearing before the
11 undersigned.

12 **IT IS SO ORDERED.**

13 DATED: _____

14 HON. VINCE CHHABRIA
United States District Judge

16 [PROPOSED] SEVERANCE ORDER

17 For the reasons set forth in the joint motion, the Court finds that severance is appropriate as to
18 defendant Robert BLANCAS in Case No. 21-CR-121 JD for the purposes of entering a guilty plea and
19 sentencing with Case No. 21-CR-105 VC, and will avoid prejudice to the defendant that might otherwise
20 arise from conviction and sentencing in two separate matters. Accordingly, the Court hereby ORDERS
21 that BLANCAS is severed from the remaining defendants in Case No. 21-CR-121 JD.

22 **IT IS SO ORDERED.**

24 DATED: _____

25 HON. JAMES DONATO
United States District Judge